



27/01/2023 (DATE OF PUBLICATION/LAST UPDATE)

ECB-PUBLIC  
UPDATABLE

## RECORD OF PROCESSING ACTIVITY

Leadership Growth Programme platform

### 1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: European Central Bank (ECB)/ Directorate General Human Resources (DG HR)

Data Protection Officer (DPO): [DPO@ecb.europa.eu](mailto:DPO@ecb.europa.eu)

### 2. Who is actually conducting the processing activity?

- The data is processed by the ECB itself  
The organisational unit conducting the processing activity is:  
Directorate General Human Resources, Talent management Division
- The ECB is using Deloitte Consulting GmbH as data processor and Enabley LTD as sub-processor in the context of managing the Leadership Growth Programme (LGP) learning management platform LGP Hub.

### 3. Purpose of the processing

The personal data are processed for the purpose enabling leaders to register on the ECB Leadership Growth Programme learning management platform LGP Hub, register to the different learning events, and make use of the learning resources published and collaborative learning functionality provided by the platform.

**4. Description of the categories of data subjects**

*Whose personal data are being processed?*

- ECB staff
- Externals (agency staff, consultants, trainees or secondees)
- NCB or NCA counterparts (in the ESCB or SSM context)
- Visitors to the ECB, including conference participants and speakers
- Contractors providing goods or services
- Complainants, correspondents and enquirers
- Relatives of the data subject
- Other (please specify):

**5. Description of the categories of personal data processed**

**(a) General personal data:**

The personal data contains:

- Personal details (name, address etc)
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided

- Other (please give details): Data on participation in learning activities (e.g. workshops, coaching), including administrative details on arrival and stay in offsite workshop venues.

**(b) Special categories of personal data**

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data, biometric data for the purpose of uniquely identifying a natural person or data concerning health
- Data regarding a natural person's sex life or sexual orientation

**6. The categories of recipients to whom the personal data have been or will be disclosed, including the recipients of the data in Member States, third countries or international organisations**

- Data subjects themselves
- Managers of data subjects
- Designated ECB staff members
- Designated NCB or NCA staff members in the ESCB or SSM context
- Other (please specify): selected employees of Deloitte (provider of leadership development services) and Enabley (provider of the learning management platform) who are involved in the implementation and facilitation of the ECB Leadership Growth Programme.

## 7. Transfers to/Access from third countries or an international organisation

Data are processed by third country entities:

Yes

Specify to which countries:

Specify under which safeguards:

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Administrative arrangement containing enforceable and effective data subject rights

No

## 8. Retention time

The personal data are stored on the external provider's database for a maximum of 24 months and are deleted thereafter.